

The Honorable S. Kate Vaughan

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JOSE MEDINA CAMACHO, on behalf of
himself and all others similarly situated,

Plaintiff,

v.

PEOPLECONNECT, INC., a Delaware
corporation; INTELIUS LLC, a Delaware
limited liability company; and THE
CONTROL GROUP MEDIA COMPANY,
LLC,

Defendants.

Case No. C21-1074-JCC-SKV

STIPULATED MOTION AND
~~PROPOSED~~ ORDER TO EXTEND
DEADLINES AND TO STAY
DISCOVERY

NOTE ON MOTION CALENDAR:
December 7, 2021

The Parties respectfully move for an agreed briefing schedule for Defendants' motion to dismiss and to stay discovery pending resolution of Defendants' motion to dismiss. In support of this Motion, the Parties state as follows:

1. Plaintiff filed a class action complaint against PeopleConnect, Inc. and Intelius LLC on August 11, 2021 (Dkt. No. 1).

2. Defendants PeopleConnect, Inc. and Intelius LLC waived service, resulting in a date to answer or otherwise plead of November 29, 2021 (Dkt. No. 17).

3. On October 28, 2021, Plaintiff filed a First Amended Class Action Complaint ("Complaint"), adding The Control Group Media Company, LLC as a Defendant (Dkt. No. 19).

1 4. On October 28, 2021, counsel for Defendants agreed to waive service for The
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3 Control Group Media Company, LLC. Given that agreement, The Control Group Media
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5 Company, LLC's date to answer or otherwise respond to Plaintiff's Complaint is December 27,
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7 2021.

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9 5. To reconcile the competing responsive dates, and in the interests of efficiency and
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11 judicial economy, the Parties agreed that the deadline for all three Defendants to answer or
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13 otherwise respond to Plaintiff's Complaint should be on the same date, up to and including
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15 December 27, 2021. On November 4, 2021, this Court entered an order extending the deadline for
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17 all Defendants (PeopleConnect, Inc., Intelius LLC, and The Control Group Media Company, LLC)
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19 to respond to Plaintiff's Complaint up to and including December 27, 2021. (Dkt. No. 22.)

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21 6. Because of competing prior obligations in a number of matters for both Parties, the
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23 Parties have agreed to extend Defendants' deadline to file its motion to dismiss Plaintiff's
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25 Amended Complaint up to and including January 14, 2022.

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27 7. The Parties agree that Plaintiff will have until February 11, 2022, to file a response
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29 to Defendants' motion to dismiss.

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31 8. The Parties agree that Defendants will have until February 18, 2022, to file a reply
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33 in support of their motion to dismiss.

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35 9. The Parties agree to stay discovery pending the resolution of Defendants' motion
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37 to dismiss.

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39 WHEREFORE, for the reasons stated herein, the Parties respectfully request that this Court
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41 grant this Motion and enter an Order extending the deadline for all Defendants (PeopleConnect,
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43 Inc., Intelius LLC, and The Control Group Media Company, LLC) to respond to Plaintiff's
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45 Complaint up to and including January 14, 2022, for Plaintiff to respond up to and including

February 11, 2022, and for Defendants to file their reply in support of their motion to dismiss up to and including February 18, 2022, and to stay discovery pending resolution of Defendants' motion to dismiss.

DATED this 7th day of December, 2021.

GORDON TILDEN THOMAS & CORDELL LLP
*Attorneys for Defendants PeopleConnect, Inc.,
Intelius LLC and The Control Group Media
Company, LLC*

By: s/ Michael Rosenberger

Michael Rosenberger, WSBA #17730
Mark Wilner, WSBA #31550
Samantha K. Pitsch, WSBA #54190
600 University Street, 2915
Seattle, Washington 98101
Telephone: 206-467-6477
mrosenberger@gordontilden.com
mwilner@gordontilden.com
spitsch@gordontilden.com

TOUSLEY BRAIN STEPHENS
Attorneys for Plaintiff Jose Medina Camacho

By: s/ Kim D. Stephens

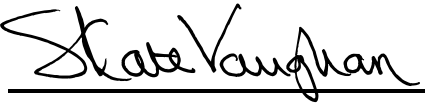
Kim D. Stephens (WSBA #11984)
Cecily Jordan (WSBA #50061)
1200 Fifth Ave, Ste 1700
Seattle, WA 98101
Telephone: 206-682-5600
kstephens@tousley.com
cjordan@tousley.com

Ari J. Scharg (*pro hac vice*)
Benjamin H. Richman (*pro hac vice*)
Benjamin S. Thomassen (*pro hac vice*)
EDELSON P.C.
350 North LaSalle Street, 14th Floor
Telephone: 312-589-6370
ascharg@edelson.com
brichman@edelson.com
bthomassen@edelson.com

Kevin Abramowicz (*pro hac vice*)
Kevin W Tucker (*pro hac vice*)
EAST END TRIAL GROUP LLC
6901 Lynn Way, Ste 216
Pittsburgh, PA 15208
Telephone: 412-877-5220
ktucker@eastendtrialgroup.com
kabramowicz@eastendtrialgroup.com

1 IT IS SO ORDERED.
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3 DATED this 8th day of December, 2021.
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7
8 S. KATE VAUGHAN
9 United States Magistrate Judge
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